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January 25, 2021

The Honorable Catherine C. Blake
United States District Judge
United States Courthouse
101 West Lombard Street
Baltimore, MD 21201

Re: *United States v. Lakeya Aldridge, et al.*
(Def: Joshua Lankford)
No. CCB-19-371

Dear Judge Blake:

Pursuant to our several status calls regarding my relationship with my client, I write to formally move the Court to order a mental health evaluation of Mr. Lankford, and thereafter a competency hearing for him, pursuant to 18 USC § 4241. I must advise the Court, briefly, as follows.

I have not spoken with Mr. Lankford in months, and he now has refused to attend at least four video/audio conferences which I have set up through CDF, in lieu of actual visits which are precluded by the pandemic. Absent some measure of his communication and cooperation with me, I cannot be effective in my role as counsel. It must be observed that my presence in this case stems directly from Mr. Lankford's behavior towards AFPD Brendan Hurson, whose experience as counsel of record is in a similar vein to mine. My replacement, I therefore submit, will not ease the passage of this matter.

Subjectively speaking, even without the overwhelming effect of the COVID pandemic we would be no closer to trial than when I entered my appearance, which is a sole and direct result of Mr. Lankford's conduct toward counsel. Furthermore, his conduct runs in diametric opposition to his repeatedly expressed desire to go to trial as soon as possible. While it would be easy to type him as obstinate, difficult or unpleasant, my client's behavior by this point far exceeds the parameters described by these pejoratives. Inasmuch as I reasonably anticipate receiving the COVID vaccine within the next few months, and thereafter being able to meet with Mr. Lankford and prepare him for trial, the fact that he has chosen to adopt a posture which serves as a fundamental impediment to any progress toward this end may well speak to some underlying issue which I am not qualified to address.

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I therefore submit that, as the next-indicated step in this matter, that the Court order Mr. Lankford be referred for a mental health evaluation, that a report then be compiled and provided to the Court and parties, and that this matter then be set in for a further status call, hearing on counsel per my letter of November 13, and/or competency hearing, as might be indicated and appropriate at that point.

Thank you for your attention to this.

Very truly yours,

/s/

Michael D. Montemarano

MDM/ap